

LEWIS  JOHS

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March 6, 2015

VIA ECF

Honorable Vernon S. Broderick, U.S.D.J.
United States District Court for the S.D.N.Y.
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, New York 10007

**Re: The Travelers Indemnity Company v. Approved Oil Co. of
Brooklyn, Inc.
Case No.: 14-cv-7723-VSB
LJAA File No: 0183-1219**

Dear Judge Broderick:

I represent Approved Oil Co. of Brooklyn, Inc. ("Approved Oil") in the above-referenced matter. I am writing on behalf of all parties and with plaintiff's consent to request an additional thirty (30) days of the deadline to move to restore the action to this Court's docket from March 12, 2015 to April 13, 2015.¹ While at this time, the parties do not anticipate having to make such a motion, we do not want to waive our right to do so.

The parties have negotiated the closing documents in this matter and the related case of Aspen American Insurance Company v. Approved Oil Co. of Brooklyn, Inc. v. SIG Fabrics, LLC, et ano., Case No.: 14-cv-1354-VSB, and require additional time for all the parties and Aspen's insureds to execute those documents. There is an issue regarding one of the individual's legal capacity to execute the closing document which still needs to be resolved. Accordingly, the parties wish to extend the time to move to re-open the case to April 13, 2015. This is the first application for this relief. We thank the Court for its consideration of these matters.

Very truly yours,

/s/

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cc **VIA ECF**: Robert A. Schultz, Esq.

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¹ Thirty days from March 12th is April 11th. However, April 11, 2015 falls on a Saturday. April 13, 2015 is the next business day after April 11th. One CA Plaza, Suite 225, Islandia, NY 11749 631.755.0101 Fax 631.755.0117 www.lewisjohs.com